

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

SHEILA PORTER,
Plaintiff

v.

ANDREA CABRAL, SUFFOLK
COUNTY SHERIFF'S DEPARTMENT,
SUFFOLK COUNTY, and
CORRECTIONAL MEDICAL
SERVICES, INC.
Defendants

Civil Action No. 04-11935-DPW

STIPULATION TO ENTER PROTECTIVE ORDER

The undersigned parties, by and through their counsel, hereby agree that the attached Protective Order governing the exchange of discovery between the parties and applicable to all proceedings in this action be issued by the Court.

**ANDREA CABRAL, SUFFOLK
COUNTY SHERIFF'S DEPARTMENT
And SUFFOLK COUNTY,**
By their attorney,

/s Ellen M. Caulo
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Deputy General Counsel
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SHEILA J. PORTER,

By her attorneys,

/s David Schumacher
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CORRECTIONAL MEDICAL SERVICES,

By its attorneys,

/s Alexandra B. Harvey
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Date: March 3, 2005